

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

<b>IN RE JOHNSON &amp; JOHNSON TALCUM</b>	)	<b>MDL NO. 16-2738 (FLW) (LHG)</b>
<b>TALCUM POWDER PRODUCTS</b>	)	
<b>MARKETING, SALES PRACTICES, AND</b>	)	
<b>PRODUCTS LIABILITY LITIGATION</b>	)	
	)	
This Document Relates to:	)	
Marion Pierce and Ralph Pierce	)	
Case No. 3:17-cv-03750-FLW-LHG; and	)	
	)	
John Aaron Kenneth Nixon, Jason Nixon, and	)	
Chris Nixon, on Behalf of the Estate of Their	)	
Mother, Shelby E. Nixon	)	
Case No. 2:18-cv-07992-FLW-LHG	)	

**LOCAL RULE 7.1.1 DISCLOSURE STATEMENT**

Pursuant to Local Rule 7.1.1, The Penton Law Firm, on behalf of Marion Pierce and Ralph Pierce; and John Aaron Kenneth Nixon, Jason Nixon, and Chris Nixon, on behalf of the Estate of Their Mother, Shelby E. Nixon, hereby discloses that these Plaintiffs are not receiving any funding for some or all of their attorneys' fees and expenses for the litigation on a non-recourse basis in exchange for (1) a contingent financial interest based upon the results of the litigation or (2) a non-monetary result that is not in the nature of a personal or bank loan, or insurance.

Plaintiffs, by Counsel

/s/ Ronnie G. Penton  
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**CERTIFICATE OF SERVICE**

I hereby certify that on September 7, 2021, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system. I further certify that I mailed the foregoing document and the notice of electronic filing by first-class mail to the following non-CM/ECF participants: None

/s/ Ronnie G. Penton  
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